

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

UNITED STATES OF AMERICA)	
)	Criminal No. 9:23-cr-00396-RMG
v.)	
)	
RICHARD ALEXANDER MURDAUGH)	

AFFIDAVIT OF L. WALTER TOLLISON, III.

PERSONALLY appeared before me L. Walter Tollison, III, who, being first duly sworn, does hereby certify and state as follows:

1. My name is L. Walter Tollison, III. and I live and practice law in Greenville, SC. I have been practicing for approximately 40 years.
2. Since 2007, I have extensive experience in both State and Federal Court serving as either Counsel to the Receiver or as the Receiver.
3. As it relates to Federal Court, I was retained by a court appointed receiver (Beattie B. Ashmore) to serve as counsel to the Receiver in *In re: 3HB*, 3:10-3141-MBS and *In re: Wilson*, 8:12-cv-2078-JMC; and currently serve as counsel to the Receiver in *In re: Kohn*, 6:19-cv-01112-BHH. These cases all involve criminal Ponzi/financial fraud schemes and involve losses in the tens of millions of dollars. These cases have spanned from 2007 until the present.
4. In these cases, I was involved from the beginning stages of investigation until the final stages of distribution. My work included, inter alia, filing lawsuits to claw-back monies and assets and later in the development of a formula and plan for claims administration and distribution, including the actual distribution of the receivership estate. Each case was unique and required a thorough understanding of the law regarding asset recovery, forfeiture, and equitable theories of distribution.

5. In the *3HB* case, the Receiver was able to distribute approximately 50% of the losses to victims and in the *Wilson* case, the Receiver was able to distribute approximately 20% of the losses to victims. Both recoveries are above reported national averages. The *Kohn* matter is still ongoing.

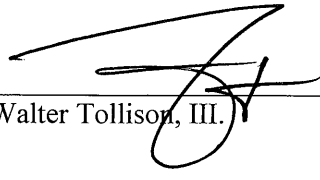
6. As it relates to State Court, I have served as a Receiver and as a Sequestrator in cases in which I was ordered to preserve, liquidate and/or distribute assets as well as settle claims. Specifically, I have served as a Receiver in *Orders v. Orders, et al.*, C.A. No. 2016-CP-23-04654; *Encore Technology Group, Inc. v. Trask, et al.*, C.A. No. 2015-CP-23-05757; *Greenville Dental Office Management Group, LLC, et al. v. Julian, et al.*, C.A. No. 2020-CP-23-03922 and as a Sequestrator in the Family Court matter *Burgess v. Burgess*, 2009-DR-23-1522.

7. Most recently, the co-Receivers for Mr. Murdaugh appointed in *Beach v. Parker, et al*, 2019-CP-25-00111, moved to have me appointed as a Special Referee pursuant to S.C. Code Ann. 14-11-60 and Rule 53 of the South Carolina Rules of Civil Procedure to administer a claims process. I attended a hearing before Judge Daniel Hall on this matter on August 25, 2023. On September 19, 2023, the State Court granted the motion.

8. I am aware of the recent filing in the Federal criminal matter concerning Mr. Murdaugh and the assets currently held by the State Court appointed Co-Receivers and the assertion that my involvement as Special Referee would result in my fees totaling “several hundred thousand” dollars.

9. Based upon the facts known to me at this time and my experience with State and Federal receivership matters, I am currently unaware of any facts or circumstances that would require or warrant my fees coming remotely close to this assertion. I think that it is reasonable to forecast fees in the range of \$50,000-\$75,000, based upon my current knowledge of the anticipated amount of work that has occurred and will be required per the current Order of Judge Hall.

FURTHER AFFIANT SAYETH NOT.



L. Walter Tollison, III.

Sworn to before me this 4th
day of October, 2023

Pamela R. Osborne
Notary Public for South Carolina
My commission expires Sept. 28, 2028